

Outgoing
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Cricket Mountain Dolomite (Graymont) - bond for amendment

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To: Duane Bays <dbays@blm.gov>





Here's some of the history behind the current bond and permitting.

- The current bond amount of \$28,100 is the original calculated bond amount from 2006 (prior to our average cost per acre methods).
- The attached file from our digital files (an email, apparently) suggests that Jerry concurred with the amount, and I think it's safe to assume that he knew that some holes were on private, but it doesn't look like it was ever broken down between private and BLM.
- The Division sent the attached letter to Graymont in 2010, releasing all but 1 of the 24 holes drilled to that point (drilled in 2007, apparently), up to 17 of which were BLM. BLM wasn't cc'd. I assume there was informal correspondence with Jerry behind the release, but I don't know.
- In 2011, an additional 30 holes were permitted by the Division under the same bond amount under the condition of acreage restrictions until the original 24 holes were plugged (didn't know they'd been released already, at least by the Division). The Division considered the bond of \$28,100 adequate for both BLM and SITLA. The State's 2011 permit was approved assuming that no surface disturbance would occur (overland access and dry drilling in cheatgrass and on rock), but bonding for some acreage just in case. I would have discussed all of this with Jerry, I believe, but I don't see a BLM concurrence letter or email.
- No drilling was reported in 2009, 2010, 2011, 2012.
- I inspected the quarry in 2012, and also inspected a few (4) plugged holes, but not others, since the quarry inspection was the priority. I remember that Jerry had inspected holes on a different trip as well, but I don't have a record of a report from him.
- We sent a letter extending the permit in 2013 and considered the bond to be adequate for 50 holes (attached), but Jerry Mansfield was cc'd by email to his old BLM address, instead of Duane Bays. Sorry, that was likely my fault.
- The 30 holes (approved by the Division in March 2011) were drilled in 2013 (see attached progress report).
- The Division approved the 2014 amendment and the current bond of \$28,100 for 20 additional holes and any existing disturbance. As is common procedure for the Division, we accepted a signed drillhole closure report for the 30 holes drilled from 2012 as justification to roll the bond to cover the future 20 holes (and with excess bond), with field plugging verification of the 30 holes to follow. This is where I unintentionally dropped the ball - I didn't look into it enough to discover that we didn't talk about re-allocating bond for those holes.

Peter

[Quoted text hidden]

4 attachments

 **Graymont Western Notice UTU 79864.rtf**
1K **03212011.pdf**
1012K **05122014.pdf**
3796K **06102013.pdf**
1351K